

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION

True the Vote, Jane Coln, Brandie §
Correro, Chad Higdon, Jennifer Higdon, §
Gene Hopkins, Frederick Lee Jenkins, §
Mary Jenkins, Tavish Kelly, Donna §
Knezevich, Joseph Knezevich, Doris Lee, §
Lauren Lynch, Norma Mackey, Roy §
Nicholson, Mark Patrick, Julie Patrick, §
Paul Patrick, David Philley, Grant §
Sowell, Sybil Tribble, Laura §
VanOverschelde, and Elaine Vechorik §
Plaintiffs, §

Cause No. 3:14-cv-00532-NFA

v. §

The Honorable Delbert Hosemann, in his §
official capacity as Secretary of State for §
the State of Mississippi, The Republican §
Party of Mississippi, Copiah County, §
Mississippi Election Commission, Hinds §
County, Mississippi Election §
Commission, Jefferson Davis County, §
Mississippi Election Commission, §
Lauderdale County, Mississippi Election §
Commission, Leake County, Mississippi §
Election Commission, Madison County, §
Mississippi Election Commission, Rankin §
County, Mississippi Election §
Commission, Simpson County, §
Mississippi Election Commission, and §
Yazoo County, Mississippi Election §
Commission
Defendants.

DECLARATION

By: L. Eades Hogue

1. “I, Eades Hogue, pursuant to 28 U.S. C. §1746, declare under penalty of perjury that the following is true and correct:

2. I am lead counsel of record for Plaintiffs in the above-styled lawsuit. I am a partner with the law firm of Beirne, Maynard & Parsons, LLP, and am an attorney in good standing with the State of Mississippi.
3. At or near the dates of the 2014 Mississippi Republican Primary Election and Run-Off Election for United States Senate, my law firm was alerted by Plaintiffs regarding numerous voting irregularities in the Primary. Plaintiffs then asked my law firm to assist them as their counsel in a lawsuit to obtain the records in issue to determine the extent to which legitimate voters in the Run-Off had their votes wrongfully diluted.
4. My law firm did its best to quickly gather the factual information, review federal and state election law, and file this lawsuit. The Republican Party of Mississippi was made a party to this case due to my firm's reasonable factual and legal investigation.
5. Further, depending on the extent to which rights of Mississippi voters were violated due to unconstitutional vote dilution, my firm believes the law indicates an appropriate remedy may necessarily be an order against the entity that effectively accepted the improper ballots and may require the revision of the certified voting results.
6. Further, declarant sayeth not."

Signed on this the 18th day of August, 2014.



L. Eades Hogue